

4. Prior application for this relief has not been made.

WHEREFORE, it is respectfully submitted that the Court grant defendant Sami Omar Al-Hussayen's motion in its entirety, and enter an Order Dismissing the Complaint against him; and for any such other and further relief as to this Court seems just and proper.

I declare under penalty of perjury that the foregoing is true to and correct to the best of my knowledge and belief. 28 U.S.C. §1746. July 23, 2004.

---

JOSHUA L. DRATEL